

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

GLD PARTNERS, L.P., and GLD SPONSOR)	
MEMBER LLC,)	No. 1:23-cv-01266-RGA
)	
Plaintiffs,)	
)	
v.)	
)	
SAGALIAM ACQUISITION CORP.,)	
)	
Defendant.)	
)	

PLAINTIFFS' NOTICE OF SERVICE OF RULE 30(b)(6) DEPOSITION NOTICE

PLEASE TAKE NOTICE that, on November 27, 2023, service of the Notice of Deposition, pursuant to Rule 30(b)(6), was effected on defendant Sagaliam Acquisition Corp. A copy of the certificate of service and the deposition notice are annexed hereto.

Dated: November 27, 2023

BELLEW LLC

By: /s/ Sean Bellew
Sean Bellew
2961 Centerville Road
Suite 302
Wilmington, Delaware 19808
(302) 3535-4951

AKERMAN LLP
H. Peter Haveles, Jr (admitted pro hac vice);
Donald N. David (admitted pro hac vice);
1251 Avenue of the Americas
37th Floor
New York, New York 10020
(212) 880-3800

Attorneys for Plaintiffs

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)	

NOTICE OF RULE 30(b)(6) DEPOSITION

PLEASE TAKE NOTICE that, pursuant to Rule 30(b)(6) of the Federal Rules of Civil Procedure, plaintiffs GLD Partners, L.P. and GLD Sponsor Member LLC will take the deposition upon oral examination of the Defendant Sagaliam Acquisition Corp., by and through person(s) designated by defendant, regarding the topics set forth in Exhibit A hereto, before a notary public or other person authorized to administer oaths. The deposition will be conducted on November 30, 2023 at 9:30 a.m. at the office of Bellew LLP, 2961 Centerville Road, Suite 302, Wilmington, Delaware 19808. GLD Partners, L.P. and GLD Sponsor Member LLC reserve the right to conduct the deposition via an online virtual medium that permits multi-way visual and audio communications (either Zoom or a comparable platform). The deposition will be recorded by stenographic and videographic means.

PLEASE TAKE FURTHER NOTICE that the deposition will continue from day to day until completed. You are invited to attend and cross-examine.

Dated: November 21, 2023

BELLEW LLC

By: /s/ Sean Bellew
Sean Bellew
2961 Centerville Road
Suite 302
Wilmington, Delaware 19808
(302) 3535-4951

AKERMAN LLP
H. Peter Haveles, Jr (pro hac vice pending);
Donald N. David (pro hac vice pending);
1251 Avenue of the Americas
37th Floor
New York, New York 10020
(212) 880-3800

Attorneys for Plaintiffs

EXHIBIT A

DEFINITIONS

As used in herein, the following terms shall have the following meaning:

1. “You,” “Your” and “Sagaliem” mean defendant Sagaliem Acquisition Corp. and its officers, directors, employees, subsidiaries or affiliates.
2. “Enzoylits” means Enzolytics, Inc. and its officers, directors, employees, subsidiaries or affiliates.
3. As used herein, "communication" refers to any oral statement, dialogue, colloquy, discussion or conversation and also means any transfer of thoughts or ideas between persons by means of documents and includes any transfer of data from one location to another by electronic or similar means.
4. As used herein, “document” or “documents” means all materials encompassed by Rule 34 of the Federal Rules of Civil Procedure and Rule 1001 of the Federal Rules of Evidence, including, but not limited to, the originals (or any copies when originals are not available), or any non-identical copies or drafts (whether different from the originals because of notes made on such copies or otherwise), of writings, emails or recordings of every kind and description, whether made by hand or by mechanical, electronic, microfilm, photographic or other means, in the possession, custody, or control of Plaintiff, its attorneys, consultants, agents, affiliated companies or representatives, or in the constructive possession, custody, care or control of Plaintiff, its attorneys, consultants, agents, affiliated companies or representatives, regardless of the source of such documents.

5. “Action” means the action entitled *GLD Partners, L.P. and GLD Sponsor Member LLC v. Sagaliam Acquisition Corp.*, Case No. 1:23-cv-01266-UNA, pending in the United States District Court for the District of Delaware.

TOPICS

Pursuant to Rules 26 and 30(b)(6) of the Federal Rules of Civil Procedure, Sagaliam shall produce one or more witnesses who can testify about information known or reasonably known by Sagaliam on the following topics:

1. The closing on all transactions or transfers between Enzolytics and Sagaliam, as referenced in the press release dated November 20, 2023 issued by Enzolytics, including all communications between Sagaliam and Enzolytics and all documents relating to said closings.
2. All documents and communications between Sagaliam and Enzolytics relating to Sagaliam’s proposed November 21, 2023 shareholders meeting.
3. All documents and communications between Sagaliam and Enzolytics relating to the Action.
4. All documents and communications between Enzolytics and Kelli Austin, Kathleen Richardson or BN Holdings Trust relating to the closing on all transactions or transfers between Enzolytics and Sagaliam, as referenced in the press release dated November 20, 2023 issued by Enzolytics.
5. The relationship between each member of Sagaliam’s Board of Directors and BN Holding Trust, including the co-trustees of BN Holdings Trust.
6. The ownership of shares of Enzolytics by any officers of Sagaliam or any member of Sagaliam’s Board of Directors or by any co-trustee of BN Holdings Trust.

AFFIDAVIT OF SERVICE

Case: 1:23-cv-01266- RGA	Court: United States District Court for the District of Delaware	County: New Castle, DE	Job: 9975749
Plaintiff / Petitioner: GLD PARTNERS, L.P., and GLD SPONSOR MEMBER LLC,		Defendant / Respondent: SAGALIAM ACQUISITION CORP.,	
Received by: DLS Discovery		For: Bellew LLC	
To be served upon: SAGALIAM ACQUISITION CORP., c/o Corporation Service Company			

, Steve Mitchell, being duly sworn, depose and say: I am over the age of 18 years and not a party to this action, and that within the boundaries of the state where service was effected, I was authorized by law to make service of the documents and informed said person of the contents herein

Recipient Name / Address: Litigation Management Representative , 251 Little Falls Drive, Wilmington, DE 19808

Manner of Service: Registered Agent, Nov 27, 2023, 10:23 am EST

Documents: Summons, NOTICE OF RULE 30(b)(6)DEPOSITION

Additional Comments:

1) Unsuccessful Attempt: Nov 22, 2023, 2:07 pm EST at 251 Little Falls Drive, Wilmington, DE 19808
CSC stopped accepting service at 2:00 due to the holiday.

2) Successful Attempt: Nov 27, 2023, 10:23 am EST at 251 Little Falls Drive, Wilmington, DE 19808 received by Litigation Management representative .

Steve Mitchell Nov 27, 2023
Steve Mitchell Date

DLS Discovery
24 N. Market Street Suite 108
Wilmington, DE 19801
202-654-3345

Subscribed and sworn to before me by the affiant who is personally known to me.

Jeffrey A. Low
Notary Public
Nov 27, 2023
Date

